



DEPARTMENT OF PARKS AND RECREATION

Inland Empire District
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Ruth Coleman, Director

November 10, 2004

Eric Haley, Executive Director
Riverside County Transportation Commission
3560 University Avenue, Suite 100
Riverside, CA 92501

Re: Draft Evaluation Criteria for Riverside County – Orange County Major Investment Study

Dear Mr. Haley:

The Inland Empire District of the Department of Parks and Recreation (State Parks) appreciates the opportunity to comment on the aforementioned document.

State Parks is a trustee agency as defined by the California Environmental Quality Act (CEQA). State Parks' mission in part is to provide for the health, inspiration and education of the people of California by preserving the state's extraordinary biodiversity and creating opportunities for high quality outdoor recreation.

As the office responsible for the stewardship of Chino Hills State Park (SP), we have an interest and concern about contemplated alterations of land use in the vicinity of the park. The long term health of CHSP is dependent on the health of the regional ecosystems because the biotic boundaries of the park extend beyond its jurisdictional boundaries.

We request that the revised "Draft Evaluation Criteria" include a discussion on Chino Hills SP, its resources, and potential impacts resulting from anticipated alternatives. Please feel free to use the information below, and/or contact us for additional information as necessary.

Chino Hills State Park Background

Chino Hills SP remains a viable, large expanse of open space serving various purposes within the expanding urban environment. In 1981, the park was established primarily for the purpose of preserving its natural landscape features, its biological diversity, and the opportunities for solitude and recreation that open space provides for people in densely populated areas.

Threats to its existence, such as a road or freeway, would severely diminish the viability of continuing to provide for the many human and non-human uses. While we recognize the need for improving mobility in the region, we feel that pursuing alternatives that cut into Chino Hills SP are not environmentally superior and the resulting significant impacts could not be adequately mitigated. I have enclosed a map of Chino Hills SP to illustrate the boundaries of the park which should be considered as primary constraints due to the significant resources existing at and near as described below.

Section 2.0 Background

There is considerable discussion on population and traffic forecasts. However, the revised document should clearly differentiate between Riverside and Orange County when discussing these and other projections. Statements appear to imply that employment will increase in Orange and Los Angeles Counties to accommodate the projected population growth in Riverside County. Southern California Association of Governments (SCAG) figures appear to indicate otherwise. Please state that the increase in employment in both Orange and Los Angeles Counties will be much less than the increase in population in Riverside County, according to SCAG. Also, please indicate that improvements in transit and demand side remedies should also be a primary focus of the MIS effort.

Section 3.1 Travel Demand and Mobility

Please include the following to the capital costs:

- Natural resources
- Recreational experience
- Aesthetics/viewshed
- Mitigation
- Habitat
- Wildlife
- Biological corridors
- Public open space
- Significant biological resources, i.e., worldwide significance

In the Financial Feasibility section, please include "mitigation" as a screening measure. In the Benefit-to-Cost Ratio, please include "a reduction in trips" as a criteria.

Section 3.6 Environmental Impacts

As written, the Draft Evaluation Criteria lack sufficient methods to evaluate and determine the initial screening of alternatives, especially as they relate to impacts to Chino Hills SP. We request that the revised "Evaluation Criteria" include the criteria listed below along with the screening and detailed measures.

Criteria: Habitat

The Southwest Ecoregion, of which Chino Hills SP is a part, is recognized worldwide as a significant area of biodiversity. This area contains a greater number of biological resources than any other area of comparable size in the United States (E.O. Wilson, *Biodiversity*, National Academy Press, Washington D.C., 1988). Chino Hills SP is also recognized globally for preserving the regional biodiversity, as shown in such periodicals as, *National Geographic*, *Discover*, and *Sunset*. The park supports at least 14 different vegetation series as defined in the California Native Plant Society's classification, *A Manual of California Vegetation*, by John O. Sawyer and Todd Keeler-Wolf (1995). Of these 14, nine are considered unique or significant in southern California because their acreage is rapidly dwindling and because of their importance as habitat to both sensitive and common wildlife species.

Screening Measures

Determine the degree that parklands will be disjoined from other protected areas.

Detailed Measures

Determine the degree of sustainability of the remaining islands. Additional detailed measures will be developed through the MIS process.

Criteria: Riparian Areas

Chino Hills SP includes a one mile long, unchannelized section of the Santa Ana River. Also within the park boundaries, Aliso Creek, which provides suitable habitat for four native freshwater fish, is the only unchannelized tributary with access to the river downstream of the Prado Dam. It also contains perennial streams which support populations of the arroyo chub. Water Canyon is designated as a Natural Preserve in the Department's classification system, giving it the highest level of protection of the important resources in this section of the park.

Screening Measures

Determine the number of species, their listing status, and the level of impact (acreage) in the Santa Ana River, Aliso Creek and Water Canyon creek resulting from proposed alternatives.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Wildlife

The great diversity of vegetation types and habitat supports the existence of a wide variety of animal species. Some of the animals occurring in the park are considered threatened, endangered, or species of special concern by the U.S. Fish and Wildlife Service and/or the California Department of Fish and Game. The following is a small list of the many species found in the park: mountain lion, golden eagle, white tailed kite, California Gnatcatcher, least Bell's vireo, southwestern pond turtle, and willow flycatcher.

Screening Measures

Determine the number of species directly and indirectly impacted by alternatives.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Wildlife Movement/Habitat Fragmentation

Chino Hills SP serves as a wildlife corridor for species traveling to and from the Cleveland National Forest, Santa Ana Mountains, Prado Basin and the Puente Hills. It connects with the Puente Hills to form the 31-mile chain of wildlands providing an ecosystem for plants, animals and people within a metropolitan setting. The Coal Canyon Biological Corridor, located on both sides of SR-91 protects biological diversity by linking 50,000 acres of Puente-Chino

Hills with 450,000 acres of the Santa Ana Mountains. Research indicates that 50% of species in the northern segment (Puente-Chino Hills) will be lost due to habitat fragmentation if a linkage to the Santa Ana Mountains is not maintained. The corridors contribute to the health of plant and animal species by allowing for movement between reserves. This maintains genetic diversity, preventing inbreeding and it allows for repopulation after a natural catastrophe. Next to habitat destruction, habitat fragmentation is the most serious threat to maintaining biological diversity in an area.

Screening Measures

Determine the number of species (plants and animals) affected by the inability or hindrance to movement. Determine the pre- and post-alternative conditions and evaluate the sustainability of the wildlife movement corridors.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Habitat Fragmentation

Screening Measures

Determine the amount of land separated by potential alternatives. Determine the amount of species (plant and animal) existing in separated areas. Determine the sustainability of the separated areas and the species.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Viewshed

Aesthetic value is attributed by park visitors to experiences, features, and qualities in harmony with natural, unmanipulated conditions and is perceived through the five senses. In addition to the tangible natural and cultural features such as plants, animals, waters, geologic features, buildings, and archeological sites, Chino Hills SP also offers many intangible qualities, such as natural quiet, solitude, space, scenery, a sense of history, sounds of nature, and clear night skies that important components of people's enjoyment of the park.

Screening Measures

Determine the amount of tangible and intangible features and qualities lost to potential alternatives.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Recreational Experience

The proximity of its natural open space to urban populations and extensive trail network make Chino Hills SP a popular and valuable recreational resource. Visitors enjoy both active and

passive recreational opportunities that focus primarily on trail use. People frequently visit the park from adjacent communities to walk, jog, bike, or ride horses. The park is also a popular spot for family and equestrian campers, as well as, picnickers.

Screening Measures

Determine the amount of open space lost and impacted. Correlate the impact and loss of open space to the purpose of Chino Hills SP. Determine the loss of unique recreational opportunities in park-poor southern California.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Criteria: Chino Hills SP General Plan

Adopted in 1999, it provides guidelines for the long-term management, development, and operation of the park.

Screening Measures

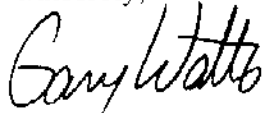
Determine conflicts with the Chino Hills State Park General Plan.

Detailed Measures

Additional detailed measures will be developed through the MIS process.

Thank you again for the opportunity to comment and for your serious consideration. For further discussion, please contact Enrique Arroyo, District Planner, at (951) 940-5664.

Sincerely,



Gary Watts
District Superintendent

cc: Rick Rayburn, State Parks
Jonathon Snyder, USFWS
Pam Beare, CDFG
Mark Durham, ACOE
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Judi Tamasi, WCCA
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